

# ACG Wealth Wrap Program Brochure

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## Item 1 – Cover Page

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This wrap fee program brochure provides information about the qualifications and business practices of ACG Wealth. If you have any questions about the contents of this Brochure, please contact our Compliance Department at 404-893-4100. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

ACG Wealth is a Registered Investment Advisor. Registration of an Investment Advisor does not imply any level of skill or training. This Brochure is designed to provide information that can be used to make a determination to hire or retain an Advisor. Additional information about ACG Wealth is available on the SEC's website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov).

## Item 2 – Material Changes

Since our initial Brochure dated September 2017, we made the following changes:

- Additional disclosures were added related to margin and other fees that may be charged. See Item 4 for more information.
- Disclosures were added related fees investments in structured products. See Items 4 and Item 6 for more information.

Additional information about ACG Wealth is also available via the SEC's website, [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov). The SEC's website also provides information about persons affiliated with ACG Wealth who are registered, or are required to be registered, as investment advisor representatives of ACG Wealth.

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## Item 4 – Services, Wrap Fees, and Compensation

ACG Wealth Inc. (“ACG”) provides portfolio management services to individuals, corporations and business entities, foundations, endowments, estates and trusts.

### ***ACG Wealth Wrap Program***

ACG and their advisors manage your accounts through various investments available on a platform accessible through TD Ameritrade, Inc. (“TD Ameritrade”). For these accounts, TD Ameritrade provides custody, transaction and banking services.

The ACG Wealth Wrap Program accounts are typically managed on a discretionary basis, meaning that your advisor has discretion over what securities to buy and sell. However, you may have your account managed on a non-discretionary basis, meaning that you must consent to each trade in the account. This trading discretion and any limitations on it will be set forth in your client agreement. The services provided are the same regardless of whether the account is managed in a discretionary basis or not. In both cases your advisor may manage and provide advice on mutual funds, stocks, bonds, exchange traded funds (ETFs), variable annuities and options contracts. All of the account structures give your advisor the ability to customize asset allocation, investment selection, and investment strategies to meet your financial situation and investment goals.

The ACG Wealth Wrap Program accounts are offered as a wrap fee program under which the client pays a single fee that covers your advisor’s advice and the execution of transactions through TD Ameritrade.

Several factors may influence a client to select a wrap fee account structure, including but not limited to:

- account size
- anticipated trading frequency
- anticipated securities to be traded
- management style
- long term investment goals

The services that ACG provides may be available from other providers for lesser fees. In addition, you may buy securities (e.g., mutual funds, exchange-traded funds, etc.) outside of our investment program without incurring fees through our program. A non-wrapped pricing arrangement may be more cost effective for accounts that do not experience frequent trading activity. Clients should consider the value of services provided by ACG when making such comparisons.

The basic fee schedule for the ACG Wealth Wrap Program account is as follows:

| <b>Asset Class</b>              | <b>Annual Wrap Fee Rate</b> |
|---------------------------------|-----------------------------|
| Up to and including \$5,000,000 | 1.25% per year              |
| Above \$5,000,000               | 1.00% per year              |

The Wrap Fee covers the advisory services provided by the ACG Advisor, execution of transactions through TD Ameritrade, and custodial services provided by TD Ameritrade.

For the majority of ACG Wealth Wrap Program accounts, fees are payable quarterly or monthly in advance based upon the account value on the last trading day of the prior month, and automatically deducted from the account pursuant to the advisory agreement and not billed separately to you. In special circumstances, and in our sole discretion, we may negotiate a lesser management fee based upon certain criteria (i.e., anticipated future earning capacity, the value of assets to be managed, related accounts, account composition, pre-existing client relationship, account retention, etc.).

Refund of fees that are paid in advance will be prorated to the date of termination, and any unearned portion will be refunded back to you.

The fee charged does not cover other broker-dealer and custodian fees, costs and compensation. Other costs that may be assessed by broker-dealers or the custodian and that are not included in the Wrap Fee include: fees for transactions executed away from TD Ameritrade, dealer mark-ups and spreads paid to market-makers. The Management Fee also does not cover debit balances or related margin interest, “mark-ups” and “mark-downs” or “dealer spreads” that broker-dealers (including broker dealer affiliates) may receive when acting as principal in certain transactions, brokerage commission or other charges resulting from transactions not effected through TD Ameritrade. The Management Fee also does not cover costs associated with exchanging foreign currencies, odd-lot differentials, IRA fees, transfer taxes, exchange fees, wire transfer fees, extensions, non-sufficient funds, mailgrams, legal transfers, bank wire charges, postage fees or SEC fees (including the activity assessment fee) or other fees or taxes required by law.

Our Investment Adviser Representatives may trade on margin for client’s accounts, which could result in a high portfolio turnover ratio and higher transaction charges in accounts with such charges. Additionally, the use of margin results in interest charges as well as all other fees and expenses associated with the security or account involved.

ACG’s affiliated broker-dealer, Arkadios, receives distribution or service fees (trails) from the sale of certain mutual funds (including money market funds) pursuant to a 12(b)-1 distribution plan or other such plan as compensation for distribution or administrative services and are distributed from the fund’s total assets. These fee arrangements will be disclosed upon request of a client and are available in the applicable fund’s prospectus. In addition, Arkadios receives compensation in connection with cash held in the account. Additionally, Arkadios receives compensation from the custodian based on the value of credit balances in the accounts. If cash is swept into a money market fund, Arkadios receives compensation based on the value of assets in these funds as broker-dealer. Thus, because ACG has an incentive to recommend that client select a money market fund as a sweep vehicle that pays more compensation to the affiliated broker-dealer than other funds, there is an inherent conflict of interest.

Moreover, ACG may recommend that certain clients invest in a structured product to provide more income for clients and to effectively provide downside protection to equity positions currently held in client accounts. The structured product is not a money market fund alternative because of its fluctuating NAV and changes in market value. The structured product is being used to provide additional income for clients versus a money market fund and to provide the client with downside protection due to changing stock market conditions. In such instances, Arkadios Capital, ACG’s affiliated broker-dealer, will receive a referral fee for such investment; however, ACG does not receive any transaction-based compensation nor can he affiliate of ACG share the compensation it receives with ACG. When an ACG client invests in the structured product, the client does not pay any additional commission or sales charges and if the client decides to redeem their investment early, no additional commissions or sales charges will be assessed to

the client. The affiliate of ACG may be required to repay a portion of the fee that it received. This creates an incentive for ACG to recommend the structured product, and once invested, to hold the structured product so that ACG's affiliate will receive compensation or retain such compensation.

### **ACCOUNT TERMINATION**

The client and/or the firm may initiate termination of the contract at any time by sending written notice to the contra party and will be accepted the day that it is received by the contra party. Refund of fees that are paid in advance will be prorated to the date of termination, and any unearned portion will be refunded back to you. A full refund will be provided without penalty if the client terminates the contract within 5 business days of signing with the firm. For the purposes of this provision, a contract is considered entered into when all parties to the contract have signed the contract, any other provisions of this contract notwithstanding.

If you instruct ACG to terminate your advisory contract and liquidate your account, we will proceed with liquidation of your account in an orderly and efficient manner. There will not be a charge by us for such redemption; however, you should be aware that certain mutual funds impose redemption fees as stated in each company's fund prospectus in certain circumstances. Clients must keep in mind that the decision to liquidate security issues or mutual funds may result in tax consequences that should be discussed with the client's tax advisor. Factors that may affect the orderly and efficient manner would be size and types of issues, liquidity of the markets, and market makers' abilities. Should the necessary securities' markets be unavailable and trading suspended, efforts to trade will be done as soon as possible following their reopening. Due to the administrative processing time needed to terminate client's investment advisory service and communicate the instructions to client's Investment Advisor, termination orders received from clients are not market orders; it may take several business days under normal market conditions to process the client's request. During this time, the client's account is subject to market risk. ACG and its agent are not responsible for market fluctuations of the client's account from time of written notice until complete liquidation. All efforts will be made to process the termination in an efficient and timely manner.

### **Item 5 – Account Requirements and Types of Clients**

In general, we do not require a minimum dollar amount to open and/or maintain an advisory account; however, we reserve the right to refuse or to terminate an account if, in our sole opinion, it is or becomes too small to effectively manage. Generally, an account is considered too small to manage if the fee charged would not reasonably compensate us for management of the account, or if the fees are no longer in the best interest of the client.

Please see the discussion under Item 4, above, for additional information on Account Requirements and Types of Clients.

### **Item 6 – Portfolio Manager Selection and Evaluation**

#### **Advisory Business**

ACG is the Sponsor and sole Portfolio Manager for the ACG Wealth Wrap Fee Program. ACG may outsource its portfolio management by using outside portfolio managers. ACG uses industry standards to measure

the performance of its Portfolio Managers; however, it does not use a third party auditor to review or verify the performance of its Portfolio Managers.

Advisory services are tailored to the individual needs of each client. Your advisor will assist you in connection with establishing and monitoring of investment objectives, risk tolerance, asset allocation goals and time horizon. Through personal discussions in which the client's goals and objectives are established, the Financial Advisor along with the client will develop a personal investment policy and will manage the portfolio according to the criteria developed. We may also invest your assets using a predefined strategy, or we may invest your assets according to one or more model portfolios developed by our firm.

Each client has the ability to impose reasonable restrictions on the management of his/her account, including the designation of particular securities or types of securities that should not be purchased for the account, or that should be sold if held in the account. If a client's instructions are unreasonable or an Investment Advisor Representative believes that the instructions are inappropriate for the client, ACG will notify the client that, unless the instructions are modified, it may cancel the instructions in the client's account. A client will not be able to provide instructions that prohibit or restrict the Investment Adviser of an open-end or closed-end mutual fund or ETF with respect to the purchase or sale of specific securities or types of securities within the fund. Although each client has the opportunity to place reasonable restrictions or constraints on the way their accounts are managed, such restrictions may cause your advisor to deviate from a strategy or recommendations that your advisor would have made if such restrictions or constraints were not in place. Thus, the account's performance may be lower than it otherwise would have been.

A portion of the Wrap Fee is paid to the firm for advisory services and portfolio management services; a portion of the Wrap Fee covers transaction costs and is paid to TD Ameritrade. Since the firm pays for transaction fees from the Wrap Fee, there is an incentive to limit trading in order to avoid paying transaction fees. Our supervisory process includes a review of accounts to ensure that trading activity is suitable based on the client's investment objectives.

ACG manages wrap and non-wrap fee accounts on both a discretionary and non-discretionary basis. Wrap accounts are usually managed using a shorter-term investment strategy. A short-term investment strategy will typically involve purchasing and selling securities within a relatively short period of time based on these securities' short-term price fluctuations. Wrap accounts consequently involve more frequent trading which would typically incur higher transaction costs if the account was in a non-wrap program. We generally manage non-wrap fee accounts using a long-term investment strategy, although occasionally there may be some short-term trades if market circumstances warrant. A long-term investment strategy will typically involve investing in securities that are anticipated to grow in value over a relatively long period of time and it would be expected that there would be lower turnover (i.e., fewer overall trades) than in an account using a shorter-term strategy.

### ***Performance-Based Fees and Side-by-Side Management***

ACG does not charge any performance-based fees (fees based on a share of the realized capital gains) and does not participate in side-by-side management.

## ***Methods of Analysis, Investment Strategies, and Risk of Loss***

Our investment strategy begins with an understanding of a client's financial goals. Advisors use demographic and financial information provided by the client to assess the client's risk profile and investment objectives in determining an appropriate plan for the client's assets. Investment strategies ordinarily include long- or short-term purchases of stock portfolios, mutual funds, fixed income securities, exchange traded funds (ETFs), variable annuities and/or options contracts.

Investment recommendations are based on an analysis of the client's individual needs, and are drawn from research and analysis. Security analysis methods may include the following:

- Charting. In this type of technical analysis, we review charts of market and security activity in an attempt to identify when the market is moving up or down and to predict when how long the trend may last and when that trend might reverse.
- Fundamental analysis: We attempt to measure the intrinsic value of a security by looking at economic and financial factors to determine if the company is underpriced or overpriced. Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.
- Technical analysis and charting: We attempt to determine the trend of a security by studying past market data, including price and volume. This presents a potential risk, as the price of a security can change directions at any time and past performance is not a guarantee of future performance.
- Cyclical analysis: We attempt to identify the industry cycle of a company to determine whether the company is in a market introduction phase, growth phase or maturity phase. Generally projected revenues, growth potential and business risk may fluctuate based on the company's cycle stage.
- Consensus Model for Determining Trends: Tracking 12 to 18 independent sources for agreement on overall mid- and long-term market forecasts and which sectors could outperform. Risks include inaccurate forecasts, major unpredictable macro events, unpredictable events in a given equity, or poor decision making by a fund manager could all adversely affect the model.
- Consensus Model for Assisting Buy and Sell Decisions: Tracking 4 to 6 technical models for consensus on market direction and recommendations on individual sectors and positions. Risks include inaccurate forecasts, major unpredictable macro events, unpredictable events in a given equity, or poor decision making by a fund manager could all adversely affect the model.

Information for this analysis may be drawn from financial newspapers and magazines, research materials prepared by others, annual reports, corporate filings, prospectuses, company press releases and corporate ratings services.

It is important to note that investing in securities involves certain risks that clients should be prepared to bear. Though the goal of the firm is to find quality investments and proper allocation strategies, there is no guarantee that the goal will be met, and/or that the value of investor portfolios may not decline in value during any given time period. For any risks associated with Investment Company products, please refer to the prospectuses for additional details about these risks. Our investment approach constantly keeps the risk of loss in mind. These risks include, but are not limited to:



- **Long- Term Purchases Risk:** When utilizing this strategy, we may purchase securities with the idea of holding them for a relatively long time (typically held for at least a year). A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantages of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.
- **Short- Term Purchases Risk:** When utilizing this strategy, we may also purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.
- **Option Writing Risk:** We may use options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative, because it derives its value from an underlying asset.
- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Tax Considerations:** Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you consult with a tax professional regarding the investing of your assets.
- **Secondary Market Risk:** A secondary market for exchange traded structured products is fully liquid if we sell and do not hold to maturity date.
- **Call Features:** Structured products may include a provision that allows the issuer or other depository institution to "call" or redeem the product prior to maturity at a given price. Call features typically are exercised when a structured product is trading at a premium to its call price in the secondary market. The call option is solely at the discretion of the issuer. If a structured

product is “called,” investors seeking to reinvest their redeemed funds will be subject to reinvestment risk because interest rates may have fallen since the time they first purchased the structured product.

### ***Voting Client Securities***

As a matter of firm policy and practice, ACG does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. ACG may provide advice to clients regarding the clients’ voting of proxies. Clients will receive their proxies or other solicitations directly from their custodian or transfer agent.

### **Item 7 – Client Information Provided to Portfolio Managers**

ACG may act as both your registered investment adviser and your portfolio manager. In those instances, your Portfolio Manager has the same access to your financial information as ACG. Your financial information includes, among other things, information on your income, net worth, and investment objectives. Your Portfolio Manager uses this information to determine an appropriate asset allocation for you and to manage your investments. When you update your information with ACG, your Portfolio Manager will have immediate access to the same updated information.

The Client may contact ACG during normal business hours to consult with their adviser concerning the management of the Client’s Account.

### **Item 8 – Client Contact with Portfolio Managers**

Communication with third party managers will be accomplished through the ACG advisor only. Consultations beyond normal business hours may require additional negotiated fees.

### **Item 9 – Additional Information**

#### ***Disciplinary Information***

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of ACG or the integrity of management. ACG has no information applicable to this Item.

#### ***Other Financial Industry Activities and Affiliations***

Certain ACG personnel are also registered representatives of a broker/dealer, such as Arkadios Capital. In that capacity, they may be paid commissions, brokerage fees, 12b-1 fees or other fees or payments for their brokerage clients, which may include clients who are also clients of ACG. These arrangements pose a conflict of interest for those individuals to the extent they have a financial incentive to recommend such sales or other transactions to the client.

Certain Advisors are separately licensed as insurance agents/brokers for various independent insurance companies. These individuals may spend as much as 5% of their time with these aforementioned non-advisory activities. In their capacities as registered representatives or as independent insurance agents,

clients will be charged separately from their advisory services. ACG clients are not obligated to purchase any recommended insurance products.

ACG recommends that clients establish accounts with TD Ameritrade Inc. ("TD Ameritrade") to maintain custody of clients' assets and to effect trades for their accounts. ACG is independently owned and operated and not affiliated with TD Ameritrade.

ACG Wealth is now affiliated through common ownership with ACG Investment Management, LLC, a Registered Investment Advisor and manager of the OGao Fund, LLC. A potential conflict of interest could occur if an IAR of ACG were to recommend an investment in the OGao Fund, LLC instead of other investments available through ACG. As a fiduciary any recommendation must be in the best interest of the client and all recommendations to invest in the Fund will be reviewed with this in mind.

### ***Code of Ethics***

ACG has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor-mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at ACG must acknowledge the terms of the Code of Ethics annually, or as amended.

Advisors of ACG may buy or sell securities that are recommended to clients. ACG's employees and persons associated with ACG are required to follow the Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of ACG and its affiliates may trade for their own accounts in securities that are recommended to and/or purchased for ACG's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of ACG will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would not materially interfere with the best interest of ACG's clients. In addition, the Code restricts trading in close proximity to client trading activity. When practical, employee trades may be aggregated with client trades. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client. Employee trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between ACG and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with ACG's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. ACG will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

You may request a copy of the firm's Code of Ethics by contacting the Compliance Department at our main number.

## ***Review of Accounts***

Your Advisor conducts account reviews at least annually. Factors that are considered during such reviews include, but are not limited to the following: investment objectives, targeted allocation, current allocation, suitability, performance, monthly distributions, concentrated positions, diversification, and outside holdings. Examples of situations that may impact your account include the following: performance that is not in line with the client's "downside risk tolerance," change in investment objective, the client makes a significant addition of capital or withdrawal of capital from the account, rebalancing of the portfolio if current allocation and targeted allocation are not consistent, concentrated position that could lead to volatility, etc.

You should receive statements at least quarterly from the qualified custodian that holds and maintains your investment assets. We urge you to carefully review such statements and compare the official custodial records to the account reports that we may provide you.

The Investment Advisor will provide Clients with Account performance reviews at least annually. The performance review may include some of the following: a written statement reflecting the assets in the Client's Account, the purchase date, the cost basis, the current market value, and other applicable performance data for the period (or since the opening of the Account). The Client will also receive monthly Account statements, tax related reports, and trade confirmations directly from the custodian.

Factors that are considered in the performance review process include, but are not limited to the following: gains and losses, yield, current allocation, performance, benchmark comparisons, net additions, concentrated positions, and diversification by asset class and segment.

You agree to inform us in writing of any material changes to your financial circumstances that might affect the manner in which your assets should be invested. You may contact us during normal business hours to consult with your Advisor concerning the management of your account(s).

If any clients are also invested in the OG Ao Fund, LLC (see item 10 above) they will receive audited annual reports on the performance and operation of the Fund directly from the Fund manager as noted in the subscription agreement.

## ***Client Referrals and Other Compensation***

ACG does not receive an economic benefit for providing investment advice or advisory services outside of the Wrap Fee charged to the client. ACG does not compensate others for Client referrals.

When an ACG client invests in a structured product, Arkadios Capital, ACG's affiliated broker-dealer, will receive a referral fee. Please see Item 4 for more information.

## ***Financial Information***

Registered Investment Advisers are required to provide you with certain financial information or disclosures about ACG's financial condition. ACG has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of any bankruptcy proceeding.

## **Brokerage Practices**

ACG participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC/NFA ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. ACG receives some benefits from TD Ameritrade through our participation in the Program.

For ACG client accounts maintained in its custody, TD Ameritrade does not generally charge separately for custody services. TD Ameritrade is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed. TD Ameritrade makes products and services available to ACG that benefit ACG but may not directly benefit its clients' accounts. Many of these products and services are used to service all or a substantial number of ACG accounts. Some of these products and services provided includes software and other technology that (i) provides access to client account data (such as trade confirmations and account statements); (ii) facilitates trade execution and allocates aggregated trade orders for multiple client accounts; (iii) provides research, pricing and other market data; (iv) facilitates payment of ACG fees from its clients' accounts; and (v) assists with back-office functions, recordkeeping and client reporting.

Most ACG Advisors are also registered representatives of Western International Securities, Inc. ("WIS") and may recommend WIS for broker-dealer services. Factors for such recommendation would be when transaction compensation is seen as a benefit to the client. For broker-dealer services, ACG or its associated persons may receive compensation, which is separate and distinct from compensation related to its investment advisory services. Commissions paid to ACG advisors for broker-dealer services may be higher or lower than those paid by other brokers.

The client may direct ACG in writing to use a particular broker-dealer to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that broker-dealer and ACG will not seek better execution services or prices from other broker-dealers or be able to "batch" client transactions for execution through other broker-dealers with orders for other accounts managed by ACG (as described below). As a result, the client could pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. In addition, the client may end up paying higher brokerage commissions because we will be unable to aggregate your orders with our other clients' orders in an effort to reduce transaction costs.

When consistent with our duty to obtain best execution, we may aggregate multiple client transactions into a single order. When the trade is executed each account included in the order will receive the average price.

## **Privacy Policy**

ACG Wealth collects non-public information about you from the following sources:

- Information we receive from you on account applications or other forms
- Information about your transactions with ACG or others
- Information we receive from a consumer-reporting agency

We do not disclose any non-public personal information about you to anyone, except as permitted by law. We maintain physical, electronic and procedural safeguards in compliance with federal standards to protect your information. If you decide to close your account(s) or you become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

Investment Advisors of ACG are Registered Representatives of Arkadios Capital ("Arkadios"). ACG will disclose customer information to and receive customer information from Arkadios for the purposes of offering additional products and services to you as well as to effect, administer, service and enforce your requested transactions and maintain and service your accounts. Arkadios may also continue to use personal information they receive from us to perform services on our behalf, to respond to communications from you, as you authorize or request, or, if you are their customer, to offer you their products or services. To the extent that you are entitled to other protections under applicable laws and these laws apply, we will comply with them when we share personal information about you.

ACG restricts access to your personal account information to only those employees who need to know that information to provide products or services to you. For more information on our Privacy Policy, please contact the Compliance Department at (404) 893-4100 or [compliance@atlantacapitalgroup.com](mailto:compliance@atlantacapitalgroup.com).